

PART III. RESPONSIVENESS SUMMARY

**For Public Comments received during the Public Comment Period
for the Glendale North Operable Unit Interim Remedy
at the San Fernando Valley Superfund Site
Los Angeles County, California**

EXECUTIVE SUMMARY

This Responsiveness Summary addresses comments received from the public, state agencies, and local agencies on EPA's proposed interim cleanup plan for the Glendale North OU. Comments from the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) on the RI report for the Glendale Study Area, the Glendale North FS Report, and the draft Proposed Plan for the Glendale North OU were received by EPA prior to issuing the Proposed Plan and initiating the public comment period. DTSC's comments and EPA's responses are available for review in the Administrative Record for the Glendale North OU and are not included in this responsiveness summary.

EPA held a sixty day public comment period on the RI and FS reports, Proposed Plan and other Glendale North OU Administrative Record documents between July 6, 1992 and September 8, 1992. A public meeting was held in Glendale on July 23, 1992. Approximately 30 representatives of the community, state and local agencies, and EPA attended the meeting. EPA staff made a presentation on the Glendale North OU alternatives, including EPA's preferred alternative, and answered questions. A transcript of the meeting is included in the Supplement 1 to the Administrative Record for the Glendale North OU.

EPA received comments orally from three members of the public during the July 23, 1992 public meeting. The first commenter was a representative of the City of Glendale. The City's comments included a request for additional water (up to 12,000 gpm) and their overall support of EPA's preferred alternative for the Glendale North OU. EPA responded to this comment by stating that the Glendale North OU remedy involves extractions of 3,000 gpm only. However, EPA has since determined that the Glendale North and South OUs will be combined and the extracted, treated water will be conveyed to the City of Glendale. If this is accomplished, an additional 2,000 gpm of extracted, treated water would be provided to the City, for a total of 5,000 gpm.

The second commenter expressed an interest in seeing EPA consider selecting Alternative 3 for the Glendale North OU interim remedy. Similar comments were also made by the City of Glendale. Alternative 3 involves treating VOC contamination using an innovative technology called perozone (hydrogen peroxide and

ozone). EPA explained that this VOC treatment is not proven at high flow rates (> 3,000 gpm), may be substantially more costly than estimated and is not effective at treating some of the Glendale North OU contaminants (e.g. carbon tetrachloride). Since the final use of the treated water is distribution to a public water supply system, EPA determined that selecting a proven technology (e.g., air stripping or liquid phase GAC) was preferable.

The third commenter expressed concern about using groundwater from the lower zone of the aquifer for blending to meet the nitrate MCL. The State also expressed this same concern to EPA in writing. EPA explained that it shares these concerns because this water is also likely to be contaminated and extracting it would likely result in vertical migration of both VOC and nitrate contamination. In addition, such extractions might interfere with the effectiveness of the Glendale North OU remedy.

EPA also received nine letters containing comments from interested community members, the City of Glendale, the California Department of Health Services Office of Drinking Water (ODW), and the Los Angeles Region of the California Regional Water Quality Control Board (RWQCB). A tenth letter was received one day after the close of the public comment period. The comments included in the tenth letter were similar to those of earlier commenters and thus EPA was able to address them. These letters are included in Supplement 1 of the Glendale North OU Administrative Record.

One member of the public was concerned that extracting 3000 gpm of groundwater over a 12-year period would result in subsidence and sink hole formation. EPA responded that subsidence is not likely to occur as a result of Glendale North OU extractions. Other commenters asked that EPA use the treated water only for reclaimed water purposes and not for drinking water. EPA explained that the treated water will be of a much higher quality than reclaimed water and will meet all drinking water standards prior to final use.

The City of Glendale's written comments were similar to those presented orally at the public meeting.

The RWQCB expressed support for EPA's preferred alternative and favors direct use of the treated water to reinjecting it. EPA also prefers direct use of the treated water but will reinject any remaining portion if a water purveyor cannot accept it. ODW stated that it considers the peroxide treatment process an experimental one and that it should not be used for the Glendale North OU interim remedy. EPA agreed with this comment. ODW also stated that the City of Glendale must obtain a water supply permit. EPA responded that the City will receive the treated water at the point of delivery and thereafter the water will need to meet all offsite

legal requirements, including permits for offsite actions, before it is conveyed to the public water distribution system.

EPA also received numerous comments from ITT General Controls, Inc. on several issues relating to the RI and FS documents and the Proposed Plan for the Glendale North OU interim remedy. Most of these comments criticized EPA for not justifying its decisions including its preferred alternative selection, suggested that EPA did not provide the proper supporting documentation and stated that the interim remedy for Glendale North OU did not demonstrate consistency with a permanent remedy for the San Fernando Valley sites. EPA responded that the Glendale North OU is an interim action and not a permanent remedy, that the RI/FS and remedy selection were conducted in accordance with the NCP, applicable EPA guidance, that an entire Administrative Record with supporting documentation is available for review at the San Fernando Valley information repositories, and finally that the Glendale North OU interim remedy would not be inconsistent with nor preclude implementation of any final remedy for the San Fernando Valley sites.

The Responsiveness Summary is divided into two parts. Part I focuses on EPA's responses to the concerns and major issues raised by members of the local community including the City of Glendale. Part II includes detailed responses to the comments received that were more legal or technical in nature. Comments submitted by State agencies are included in Part II.

ATTACHMENT B

GLENDALE NORTH OPERABLE UNIT

RECORD OF DECISION

PART I: DECLARATION

PART II: DECISION SUMMARY

PART III: RESPONSIVENESS SUMMARY

SAN FERNANDO VALLEY AREA 2 SUPERFUND SITE

LOS ANGELES COUNTY, CALIFORNIA

**United States Environmental Protection Agency
Region 9 - San Francisco, California**

ATTACHMENT C

GLENDALE SOUTH OPERABLE UNIT

RECORD OF DECISION

PART I: DECLARATION

PART II: DECISION SUMMARY

PART III: RESPONSIVENESS SUMMARY

SAN FERNANDO VALLEY AREA 2 SUPERFUND SITE

LOS ANGELES COUNTY, CALIFORNIA

**United States Environmental Protection Agency
Region 9 - San Francisco, California**

ATTACHMENT D

RESPONDENTS TO
ADMINISTRATIVE ORDER ON CONSENT FOR REMEDIAL DESIGN,
IN THE MATTERS OF GLENDALE NORTH OPERABLE UNIT
AND GLENDALE SOUTH OPERABLE UNIT.

Access Controls, Inc.
Admiral Controls, Inc.
Brock Bus Lines
Burbank Steel Treating, Inc.
Courtaulds Aerospace, Inc.
Credit Managers Association of California
EEMCO/Datron Inc.
Fiber-Resin Corporation
Foto-Kem Industries, Inc.
GCG Corporation
Haskel International, Inc.
ITT Corporation
Joseph A. Thomson
Lockheed Corporation
Loral Librascope Corporation
Menasco Aerosystems Division of Coltec
Industries Inc.
Pacific Bell
Philips Components Discrete Products Division of
Philips Electronics North America Corporation
Ranchito Allegra
Southern Pacific Transportation Company
Sterer Engineering & Manufacturing Company
The Prudential Insurance Company of America dba
Prudential Realty Group
The Walt Disney Company
Vorelco, Inc., a division of
Volkswagen of America, Inc.
ZERO Corporation